

GC0104

Workgroup Consultation responses



Workgroup meeting 5 – 4 April 2018

GC 104 Responses (11)

- ENA
- SSE Generation Ltd
- NGET
- RWE
- The ADE
- Flextricity
- SP Generation
- UKPR
- ENWL
- Northern PowerGrid
- SP Energy Networks

Standard Consultation questions

1. Do you believe that GC0104 Original or any potential alternatives for change better facilitate the Grid Code Objectives?

- 9/11 Yes (one stating that new DSR requirements are more confusing – Flextricity)
- 1/11 Not quite depending on how storage is handled (RWE)
- 1/11 No due to the modification being deficient in terms of lack of detail around the technical requirements (SSE)

2. Do you support the implementation approach?

- 9/11 Yes
- 1/11 Broadly ok (RWE)
- 1/11 No – Directive 2015/1535 3 month ahead of implementation submission to the Commission required and technical requirements required in the Grid Code not in BCAs (SSE)

Standard Consultation questions

3. Other comments?

- **SPEN (SP Energy Networks)** The Workgroup have strived to achieve a balance between providing a sufficient level of detail in the Grid and Distribution Codes to ensure that GB can comply with the requirements of the DCC whilst still allowing the emerging DSR practices to develop and innovate appropriately without being constrained by prescriptive hard coded text. Whilst significant effort has been made in relation to definitions, SPEN still have concerns in relation to the interpretation and application of the EU GSP definition. We would support the provision of further clarity in this regard.
- **ENA&Northern PowerGrid** Demand Side Response services are in their infancy. Requirements in GB must do no more than reflect the absolute basics of DCC. Balance appears to have been achieved in the latest drafting.
- **Flextricity** – Confusion will be created in the market if implemented as is. Guidance documentation required to add clarity on what documentation is required
- **RWE** – Storage and how it is being handled when exporting?
- **SSE** - Issues raised around being able to raise an alternative request due to the lack of technical requirements outlined within the Consultation document...

Standard Consultation questions

Comments continued

- **SSE** – Issued also raised around harmonisation. Reference to P362 and Authority delegations.
- **UKPR** – concern around time taken to get the requirements implemented but content that this will be completed in time

Alternative request – Question 4

- One alternative request received from Northern PowerGrid to be discussed this afternoon

Specific GC0104 questions

Q11. If you do not believe the proposal sufficiently discharges DCC obligations, can you please provide examples where this is the case?

- **5/11** No comment
- **5/11** Discharges requirements
- **1/11** Policy approach rather than legal, no technical requirements in mapping (SSE)

Specific GC0104 questions

Q12. Consultation question specifically for Transmission Licensees

As a Transmission Licensee, are there any aspects of this consultation you do not agree with from a Transmission Licensees perspective? In particular do you have any comments with regard to DCC Articles 28 and 29 in particular Article 29(2)(d) where there is a requirement for the relevant TSO to consult with TSO's in the Synchronous Area.

- No, from an SPT perspective we have not identified any areas of disagreement, and believe it is appropriate for the relevant TSO to consult with other TSO to ensure a coordinated and consistent approach
- NGET – completed through Workgroup and Code Administrator Consultation

4 April 2018

Deep dive on:

Alternative request received and **question 9** of Workgroup Consultation:

- *Can you see any issues with treating GSPs and EU GSP's in the way set out in the Glossary and Definitions and European Connection Conditions of the solution?*

Question 10 and DRSC

- *Do you agree that the DRSC reflects the requirements of DCC and provides sufficient information for Demand Response Providers. If not, please state why do not believe this to be the case and what you believe would provide a better alternative.*
- **Start legal text review**

Specific GC0104 questions

Q9. Can you see any issues with treating GSPs and EU GSP's in the way set out in the Glossary and Definitions and European Connection Conditions of the solution?

- **5/11** No comment
- **4/11** Further clarity required/alternative request
- **2/11** Fit for purpose/no issues

Specific GC0104 questions

Q10. Do you agree that the DRSC reflects the requirements of DCC and provides sufficient information for Demand Response Providers. If not, please state why do not believe this to be the case and what you believe would provide a better alternative.

- 1/11 ADE response to be reviewed
- 3/11 No comment
- 5/11 Yes plus one comment around DRSC A.2 - Excess of what is required in DCC? (ENWL)
- 2/11 No – Not enough detail to understand obligations, more documents to read rather than in one place. Obligations in DRSC could be put in STCs to avoid this (Flexricity) No - Ancillary Service agreement Governance an issue and also this modification should be the whole package and is not – does not reflect requirements (SSE)